

Petitions should be submitted in duplicate to:
National Organic Standards Board,
c/o Robert Pooler, Agricultural Marketing Specialist,
USDA/AMS/TM/NOP, Room 2510-So., Ag Stop 0268,
P.O. Box 96456,
Washington, D.C. 20090-6456.
Phone: 202/720-3252.
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e-mail: nlpetition@usda.gov.

**Petition for Amending the National List of the USDA's
National Organic Program
for inclusion of:**

Celery Powder

A Non-organic agricultural substance allowed in processing

Submitted date: January 31, 2007

by

- **Jerry Brown, President, Florida Food Products Inc., 2231 CR 44 West, Eustis, FL 32726: phone 352 357 4141; fax 352 408 6014; e- mail jbrown@floridafood.com**
- **Jim Bacus, Jim Bacus Consulting, 3558 NW 97th Blvd. Gainesville, FL 32606, phone (352) 505-5550, fax (352) 505-5559, email jbacus@cox.net**

Petitioners are required to provide the following information as applicable:

Item A, Category for inclusion on the National List:

- §205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s))”

Item B,

1) Common name:

- Celery Powder, Vegetable Juice Powder Natural, Natural Flavor.

2) Manufacturers name, address and telephone number

- Florida Food Products Inc., 2231 CR 44 West, Eustis, Fl 32726: phone 352 357 4141: fax 352 408 6014.
- This product is currently produced for marketing by CHR Hansen.

Item C, Chemical Structure:

- N/A

3) Intended or current use of the substance:

- Celery powder is being used in meat, poultry and seafood products primarily as a natural source of nitrate (NO_3^-), although it also can contribute to a “savory” flavor of the final meat product. This natural nitrate is converted to nitrite (NO_2^-) when combined with specific microorganisms in the meat. Typically, 0.2% to 0.5% celery powder is added to the meat product along with 0.01% to 0.5% of meat starter culture to effect the reaction. Once the nitrite is generated, it immediately reacts with the meat pigment to result in a typical “cured” meat product (ie. hot dogs, bacon, ham, corned beef, pastrami, salami. Currently, celery powder is being used by many meat and poultry processors producing natural and organic meat products where the synthetic chemicals, nitrate and nitrite, are not permitted.

4) Crop livestock or handling activities for which the substance will be used:

- Celery powder will be used for Handling (processing).

5) Sources and detailed description of manufacturing procedures:

- See Attachment #1. Process Flow Chart and Narrative

6) Summary of any previous reviews by state or private certification agencies:

- Celery Powder in non organic form is currently being allowed for used in products labeled organic by several NOP accredited certifiers. Oregon Tilth Certified Organic (OTCO), Quality Assurance International (QAI) and California Certifier Organic Farmers (CCOF) have approved and are currently allowing Celery Powder to be used in products labeled as “Organic” or “Made With Organic...”. Allowance is contingent upon the certified entity’ ability to verify the unavailability of Celery Powder in sufficient quantity, form or quality. Inclusion of non organic Celery Powder must also comply with §605.302 Standards on calculation of formulation in order to be eligible to be labeled organic and to display the USDA organic seal..
- Since the development of Celery Powder as a natural source of nitrate in value added meat products has been practical only after the publication of the NOP in October 2002 there is no certification precedence information predating the NOP rule.

7) Regulatory status with EPA, FDA or state authorities:

- The FDA and USDA recognize “celery powder” as a food which can be labeled by its common or usual name or as a “natural flavoring” per references below:

Re: USDA FSIS Directive 7140.1

B. QUESTIONS REGARDING LABELING OF FLAVORINGS

1. QUESTION: What commonly used ingredients may be designated as flavors?

ANSWER: Spices, spice extractives, onion powder, garlic powder, **celery powder**. Spices are listed in 21 CFR 182.10.

Re: 21 CFR, Chapter I, Sec. 101.22

(3) Substances obtained by cutting, grinding, drying, pulping, or similar processing of tissues derived from fruit, vegetable, meat, fish, or poultry, e.g., powdered or granulated onions, garlic powder, and **celery powder**, are commonly understood by consumers to be food rather than flavor and shall be declared by their common or usual name.

8) Chemical Abstract Service (CAS) number or other product number, samples of labels:

- See attachment #2; Chr Hansen Product #672303 Information Sheet and Label.

9) Physical properties of the substance and chemical mode of action: including a) interactions with other substances, b) toxicity and environmental persistence, c) environmental impacts from it's use and or manufacture, d) effects on human health, e) effects of soil organisms, crops or livestock:

a) Refer to item #3 for information regarding interactions with other substances.

b) through e) N/A

10) Safety information, including a MSDS (Material Safety Data Sheet) and report from National Institute of Environmental Health Studies (NIEHS):

- N/A

11) Research information, including research reviews and bibliographies:

- See attachments

#3; “Natural Ingredients for Cured and Smoked Meats”, Jim Bacus, Ph.D., RMC 2006 (www.meatscience.org)

#4; “Natural and Organic Meat Products”, Jim Bacus, Ph.D., Food Research Institute, “Trends, Concerns, and Solutions for Natural and Organic Food Safety”, November 14, 2006

#5; Sindelar, J. Investigating Uncured No Nitrate or Nitrite Added Processed Meat Products, Ph.D. Iowa State University, 2006 (summary only)

12) Petition justification statement - that states why the synthetic substance is necessary, alternatives that could be used, beneficial effects to the environment, etc:

- Until such time as organic processed meat production reaches the critical mass that will entice celery powder manufacturers to cater to this niche by producing celery powder from certified organic celery raw material it is imperative that celery powder be listed on the National List §205.606 before June 8, 2007 in order to assure an uninterrupted supply of many different value added organic meat products by several well established certified organic processors.

Celery Powder is easily definable as agricultural but is not commercially available in organic form. There is nothing in the growth or manufacture of this ingredient that would prevent it from being grown and processed as certified organic. The challenge, is that while organic celery powder could easily be produced as organic and would certainly be required for use in products labeled as organic the size of the organic meat market is not yet substantial enough for a natural celery manufacturer to find it a suitably attractive market. It is reasonable to expect that the organic sector will eventually be catered to with organic celery. In fact there has been discussion between the producers and processors about securing organic celery in order to make this product organically.

As is the case with any agricultural minor ingredient, if and when market forces respond to this niche processors will be obligated to use the organic version. The manufacturer of organic celery powder would be assured of a market since organic agricultural ingredients are mandated by NOP when available. Therefore putting Celery Powder onto the 606 list will not interfere with the development of the organic version. It is important to consider also that as organic celery powder becomes available and as the demand for these value added meat products increases there may very well be times when demand outpaces supply and non organic celery powder will need to be used to fill the drought.

The attached processing information reflects the simplicity of the celery powder process. The fresh celery is cleaned, concentrated by evaporation, heated and dried. There are no other chemicals or preserving agents used in the manufacture process. Further information provided with this petition demonstrates that nothing in the use, nutrition, or labeling of celery powder is incompatible with a system of organic production. NOP accredited certifiers have allowed this minor ingredient in it's non organic version as long as their clients can verify that they followed protocol in attempting to source organic.

Celery Powder serves a dual purpose in the formulation of meat products. In addition to flavor, its primary function is as a natural source of nitrate which cures meat without relying on synthetic nitrates and nitrites. This is ancient technology dating back thousands of years. There are other vegetables and minerals which contain natural nitrates including beets, spinach and sea salt. Although each has its benefits and challenges none are an identical equivalent to natural celery powder in quality, form and function. While there may be some initial concern to the idea of adding nitrates naturally to certified organic products there is in fact no way to curtail the addition of natural nitrates to organic products since if and when these powders become available in organic form they will be allowed according to National Organic Standards.

Manufacturers of organic meat products struggled for years to develop traditionally cured products such as Ham, Bacon and Hotdogs that were accepted by consumers without any nitrates from either natural or synthetic sources. These products were noticeably less than satisfactory with poor texture, color and flavor. The result was poor sales of these products in the organic marketplace. Consumers were understandably not willing to pay higher prices for lower quality products.

With the advent of Celery Powder as a natural source of nitrate, product quality, consumer acceptance and consequently considerably higher demand for value added organic meat products has resulted in increased demand for organic livestock as well as better utilization of organic meat trim. Such an increased demand benefits organic livestock farmers, organic feed producers as well as organic processors. Furthermore the producer/marketer of organic meat products using organic celery powder would in many cases be able to label their products "100% organic since in many formulas now the only non-organic ingredient is the casing.

At the time that this petition is being written the organic processed meat business is growing into a significant sector of the organic food sector. A full spectrum of value added meat, poultry and seafood

products including cured sausage products are essential to a successful organic manufacture plan since utilization of the entire organic animal as organic is critical. This success translates into increased demand and higher, more stable pay prices for organic livestock producers.

Item N, Commercial Confidential Information Statement - describing information that is considered to be confidential business or commercial information:

- This petition for the addition of Celery Powder to the National List section 205.606 is being submitted by the manufacturer; Florida Food Products Inc. for the benefit of everybody presently manufacturing organic sausages. There is nothing confidential or exclusive in this document.

It is our sincere hope that the information presented here is sufficient to approve the addition of celery powder to section 205.606 of the National List prior to June 2007 in order to seamlessly allow production of organic value added meat products to continue. To that end the services of the signatories of this petition are available to the National Organic Program and the National Organic Standards Board regarding any questions, concerns or additional information necessary to expedite this process

Attachment #1

Vegetable Juice PWD NAT Process Description

Our celery powder originates from the raw celery leaves loaded directly on trailers in the field and transported to processing facility.

Celery is off loaded to a chlorine based water rinse tank where it is washed, rinsed, inspected, rejecting off grade celery.

Celery is then conveyed to disintegrator where macerated product is blanched, conveyed to a liquid/solid separator, where insolubles are segregated and juice is pasteurized, concentrated, chilled, frozen and stored at 0°F.

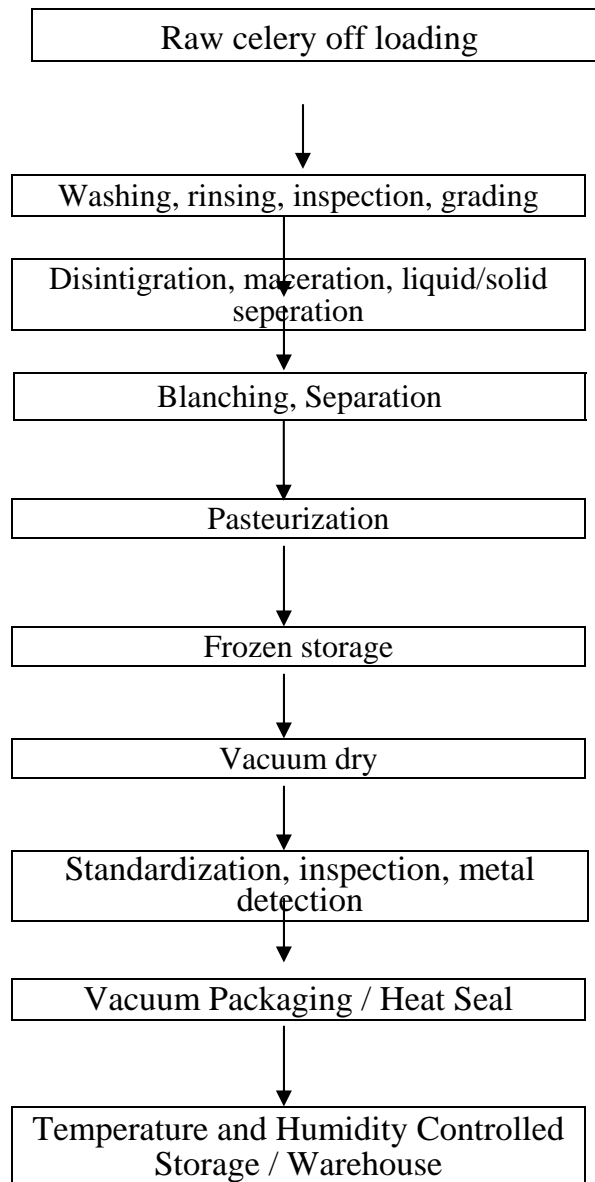
After Quality Control inspection, product is removed frozen from freezer, dumped, pasteurized and then dried on premises with vacuum dryer.

Final product is standardized and QA cleared. It is then screened, inspected and vacuum sealed in foil lined bags for placement in corrugated boxes available to ship.

Attachment #1

Process Flow Chart

Vegetable Juice PWD NAT



ISSUED: 9/05/03
UPDATED: 11/24/04, 04/05/06
05/18/06

Vegetable Juice PWD NAT

Product Information

672303

August 2005: CWR

Product Description: Vegetable Juice Powder Natural is a dried powder derived from the flesh of celery. It retains the typical sweet flavor of raw celery.

Ingredients: Natural Flavor (Celery Powder).

Storage: To assure best quality, storage and shipment in tightly closed containers at 50° to 80° F (10° to 27° C) is recommended. Store in a cool, clean, and dry area with relative humidity at 70% maximum.

Stability: If stored in sealed containers under proper conditions, this product should remain stable for twelve (12) months.

Packaging:	<u>Code #</u>	<u>Package Size</u>
	672303	44.09 Lb (20 kg) Foil Pouch

Applications: Vegetable Juice Powder Natural can be used in meats, dry soups, beverages, and seasoning blends.

Usage Level: 0.2% or higher.

Approval: Vegetable Juice Powder Natural complies USDA regulations 9 CFR 317.2 (f) (1) (i).

Labeling: Natural Flavor, or Celery Powder.

672303 Vegetable Juice PWD NAT PI/Aug 2005 /1:1

Chr. Hansen, Inc. - 16300 W. Lincoln Ave. - New Berlin, WI 53151 USA - Phone: 888-289-2218 - Fax: 262-814-2188
www.chr-hansen.com

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Vegetable Juice Pwd Natural 672445, 672303

Nutritional

Average unit per 100g

Calories	340
Calories from Fat	14.4
Calories from Saturated Fat	4.5
Protein	10.2 g
Carbohydrates	70.5 g
Dietary Fiber	12 g
Soluble Fiber	g
InSoluble Fiber	g
Sugar - Total	45.5 g
Other Carbs	g
Fat - Total	1.6 g
Saturated Fat	0.5 g
Mono Fat	g
Poly Fat	g
Trans Fatty Acids	g
Water	5 g
Cholesterol	0 mg
Ash	9 g

Vitamins

Vitamin A IU	990 IU
Thiamin-B1	mg
Riboflavin-B2	mg
Niacin-B3	mg
Vitamin-B6	mg
Vitamin-B12	mcg
Biotin	mcg
Vitamin C	20 mg
Vit E Alpha-Tocopherol	mg

Average unit per 100g

Folate	mcg
Vitamin K	mcg
Pantothenic Acid	mg
Minerals	
Calcium	330 mg
Chloride	mg
Chromium	mcg
Copper	mg
Iodine	mcg
Iron	4.3 mg
Magnesium	mg
Manganese	mg
Phosphorus	mg
Potassium	mg
Sodium	1000 mg
Other	
Alcohol	g
Caffeine	mg

The nutritional values reported are calculated based on the best available database at the time of calculation. This information is provided for preliminary evaluation only. The finished product should be analyzed for accurate labeling purposes.